BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In Re: Applications of) MM Docket No. 93-156
TRINITY CHRISTIAN CENTER OF SANTA ANA, INC d/b/a TRINITY BROAD- CASTING NETWORK) File No. BRCT-911129KR)
For Renewal of License of)
Station WHSG(TV), Monroe, Georgia	
and	,
GLENDALE BROADCASTING COMPANY For Construction Permit Monroe, Georgia) File No. BPCT-920228KE)
TO: The Honorable Joseph Chachkin Administrative Law Judge	

WRITTEN DIRECT CASE OF TRINITY CHRISTIAN CENTER OF SANTA ANA, INC., d/b/a TRINITY BROADCASTING NETWORK (TRINITY EXHIBITS 32 AND 33)

Submitted by:

Colby M. May, Esq.
Joseph E. Dunne III, Esq.
MAY & DUNNE, CHARTERED
Suite 520
1000 Thomas Jefferson Street, NW
Washington, D.C. 20007
(202) 298-6345

Attorneys for Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network

Federal Co	Federal Communications Commission	
Docket Na 9/1/19/2	194 Exhibit No. 32	
Presented by	7.5 7	
	(Identified 5.17-94	
Disposition	Received 8.17.14	
	Rejected	
A Properties	3 42	
10 6 17 ×	176	
215		

TESTIMONY OF SCOTT W. JACKSON

- 1. My name is Scott W. Jackson. I live at 904 Arthur Avenue, High Point, North Carolina. I first began working for Trinity Broadcasting Network, Inc., which became Trinity Christian Center of Santa Ana, Inc. ("Trinity" or "TBN"), in April of 1986 at WLXI-TV, Greensboro, North Carolina, as a fulltime Master Control Operator. I also did some production work at the station. In February, 1991 I was transferred to TBN's new station, WHSG-TV, channel 63 in Monroe, Georgia (Hereinafter referred to as "WHSG-TV" or "the Station"). I worked at the Station from February 22, 1991 until I resigned on July 9, 1993, with a title of "Station Supervisor, " subsequently changed to "Station Manager." As Station Manager my job was to supervise the Station staff, to interview and recommend the hiring of Station employees, and to ensure the Station's compliance with FCC rules, such as maintenance of the public file and the preparation of the Station's Quarterly Reports. As described in greater detail below, I also conducted the first community leader interviews at the Station and supervised the Station employee who subsequently conducted the interviews. The Station went on the air on Program Test Authority on February 22, At that time the Station broadcast 16 hours per day, and subsequently increased its broadcast hours in increments to 24 hours per day on February 28, 1991. The Station has operated 24 hours a day, with the exception of Sundays, when the Station shut down for four hours to allow for equipment maintenance, since that date.
 - 2. From the time the Station went on the air on February 22,

1991 until April 1, 1992 (hereinafter the "License Term") WHSG-TV received a number of letters from our viewers. Many letters were requests for prayer that were too personal to be included in our public file but which showed that many people in our service area looked to WHSG-TV for spiritual support. Older viewers, particularly those who were house bound, ill, and/or unable to attend church, often related to us how important WHSG-TV's broadcast service was to them. A sample of the letters received during the License Term is attached at Tab A. Mrs. Mary Murray wrote us repeatedly, as did others.

- 3. During the License Term we followed various procedures designed to make sure that we were aware of the problems and needs of our viewers in the Station's service area. After I became Station Manager I called my former colleagues at WLXI-TV for guidance on how to do ascertainments. I also received instructions from the TBN Department of Public Affairs in California, first from Deanna Sebastian, and then, after the fall of 1991, from Dixie West.
- 4. The Station's procedures for determining the problems and needs of the community changed and evolved during the License Term as I learned more about my job and about TBN procedures. The end product of our attempt to determine the community's problems and needs was the preparation of what we called "the Quarterly Report," which was placed in the Station's public file within ten (10) days after the end of each calendar quarter. A copy of each Quarterly Report placed in WHSG-TV's public file during the license term is

included at Tab B. I'll describe how each of these reports was prepared below.

- 5. The first Quarterly Report, covering the period from when we went on the air in late February, 1991 through the end of March, 1991, was prepared in California and sent to us. I was so new at my job that neither I nor any member of the Station staff did any ascertainment of the needs and problems of the local service area during that first quarter. I do not know the source of the problems noted on our first Quarterly Report. Since I was unfamiliar with the process I simply placed what I received from California in WHSG-TV's public file.
- During the second calendar quarter of 1991 (April-June, 1991), I began regularly reading the daily edition of the Atlanta Journal Constitution. I kept a tally of the number of mentions of a particular issue or problem in the newspaper, and cut out these articles and included them in a folder. I then sent what was Preliminary Report, listing the top five problems identified by our ascertainment, to TBN's Department of Public This Preliminary Report was prepared after the first month or six weeks of each calendar quarter. For this calendar quarter I relied on the problems reported in the Atlanta Journal Constitution to compile my list of problems. In subsequent calendar quarters we also began conducting telephone interviews of community leaders concerning the problems, needs and interests of the service area. Responses from the interviewees concerning the service area's problems would be tallied up, including the mentions of problems

and issues in the Atlanta Journal Consitution, and a list the top five problems would be prepared. The list of problems were sent to the Trinity Public Affairs Department. This Preliminary Report, including the community leader interview sheets, was reviewed by Trinity's Department of Public Affairs and passed on to TBN's programming department. The purpose for sending the preliminary and final reports to TBN was to assure that the network was aware of the problems and needs of the WHSG-TV service area, so that the public affairs and other programming produced by TBN would be responsive to the needs and interests we had determined in our service area.

- 7. During the License Term the ascertainment interviews were either done by me, or by a Station employee (a master control operator) working under my supervision, Ben D'Amico. Doing ascertainments required us to do a number of things. We continued to read the daily editions of the Atlanta Journal Constitution on a daily or weekly basis, as appropriate, to determine which issues and problems are attracting the most attention in the community. Articles which discussed various problems and issues were cut-out and kept in a folder.
- 8. During the third and fourth calendar quarters of 1991 we interviewed 75 Atlanta area community leaders each quarter by telephone, requesting those leaders' input concerning the most pressing problems facing the community. During the first quarter of 1992 we interviewed 25 community leaders.
 - 9. When community leaders were contacted by me or Mr.

D'Amico they were asked to identify what they thought were the three most significant problems and needs in the service area. Community leaders were identified by reference to the newspaper accounts that were read and by doing research, such as looking up organizations in the telephone book. As part of our procedure our goal was to identify and interview, each quarter, at least one leader representing each of 19 different categories organizations or interests. These categories include: government; business; military; agriculture; education; religion; civic and fraternal organizations; organizations of and for minorities; organizations of and for women; culture; recreation; the elderly; and, the environment. An example of a tabulation for the third and fourth quarters of 1991 showing the number of representatives of each kind of organization contacted is attached at Tab C.

technique or format. When organizations representing a particular group or interest were called based on information taken from the phone book, I made sure that the person with whom I ultimately spoke was a legitimate representative of that organization, who was qualified to speak for that organization. I generally asked to speak to the president. Mr. D'Amico followed the same procedure. During a telephone interview we asked the person to give their name, title, and race or ethnic group. I verified the person's level of authority and asked them a question like: "what, in your opinion, are the top three issues that need to be addressed in the community." I did not to give the person interviewed a list of

issues from which to choose, but tried to let the person interviewed generate their own list of problems. If a community leader mentioned a specific problem, such as "crime," I tried to encourage the person being interviewed to elaborate. I filled in the information concerning a person's response to my questions, and other information concerning the interviewee, including the person's leadership category, name, address and race or ethnic group, using a form. An example of the community leader interview form which I completed during the License Term, is attached in Tab D. I kept track of the race and ethnic group of those I interviewed so that at the end of the quarter we had a sample of all the races and ethnic groups in the Station's service area we had contacted. We also used these forms to be sure that we didn't re-interview the same persons.

11. During the quarter we kept a running count of the problems and needs mentioned by all the sources that I was reviewing, including: newspapers; telephone interviews with community leaders; and, later in the License Term, during the first quarter, 1992, we also used comments made by viewers who called the Station. The problems and needs identified were noted on a tally sheet, an example of which for the fourth quarter, 1991 I have attached in Tab E. My general procedure was to count the number of mentions of each problem in the community leader interviews and in newspaper articles, and rank the problem based on the total number of mentions. I say "generally" because I have discovered that the tally of problems in the Fourth Quarter, 1991, included only the

community leader interviews.

12. At the end of the calendar quarter we would send a final report concerning the Station's problems to TBN's Public Affairs Department. The final report would be similar in style and content to the preliminary report, and list the top five problems or issues as determined by our surveys. Within a few days after we sent in our final report the Station would receive the Quarterly Report for KTBN-TV in Santa Ana which listed a number of problems and a description of programs broadcast by Trinity during the calendar quarter responsive to those problems. If the problems on the report we received from Trinity did not match the top problems determined in our service area, we called the Public Affairs Department and asked if they had any programs responsive to the problems identified in our service area which their first list had omitted. Within a few days we would receive a description of those programs which were responsive to the problem which we had identified. would then prepare a Quarterly Report based on the list of problems we had determined were the most important to the residents of the service area, and the information which we received from the Public Affairs Department concerning the programs broadcast on Trinity responsive to those problems. This Quarterly Report would provide the program titles, times, date of broadcast, duration, source and a description, taken from the Trinity continuity notes, of the programs which were responsive to the top problems and needs of the Station's service area as determined by our ascertainment. information about programs and problems which matched our problems

would be incorporated in our Quarterly Report, and I would be sure to change the time of broadcast of the programs to match the times the programs were broadcast in the Eastern time zone. Public Service Announcements broadcast on the Station were also included in the Quarterly Report. As Station Manager I would review the final draft of the Quarterly Report, and the completed document would be placed in the WHGS-TV public file.

I have attached in Tab B the Quarterly Reports for the entire renewal term. I note here that the Quarterly Reports were erroneous in identifying, as they do, certain programs such as Joy, Treasures Out of Darkness and Praise the Lord as "L" for local. These programs are produced in Southern California and are local productions for KTBN-TV, not for WHSG-TV. In addition, the first Quarterly Report, covering a period of only five weeks right after the Station went on the air, included no information about the problems and needs of the service area, since we hadn't had an opportunity to begin to systematically determine what those problems and needs were. I don't know what was the source of the problems identified on that Quarterly Report. In reviewing the Quarterly Reports I did not take the time to compare the programs listed on the Quarterly Report with our logs of the programs actually broadcast. In fact, because of transmitter problems, last minute substitutions, or simple human error, on occasion the programs noted as broadcast in the Quarterly Report were not broadcast, or not broadcast at the same time or day noted. A list of public service announcements and programs listed on our Quarterly Reports which were not broadcast or for which erroneous times were noted in the Quarterly Reports are included at Tab F.

- In discussing what programming WHSG-TV broadcast during the License Term I should note that certain types of programming were not broadcast over WHSG-TV during the License Term. For example, WHSG-TV did not broadcast any TBN produced local programming during the License Term, or locally produced public service announcements (PSA). The Station, of course, had the capability to transmit locally produced programming, and even had rudimentary production equipment so that it could originate programming in an emergency, but a studio suitable for the sort of local production that TBN wanted had not yet been built. in the process of planning and building a studio suitable for program production, and had acquired land for a studio, but the facility was not ready during the License Term. As will be described below, WHSG-TV did broadcast programs produced in Atlanta which were local to WHSG-TV. However, the Station itself produced no local programming. In the WHSG-TV's television market, the Atlanta Television Market, a number of stations broadcast a greater or lesser amount of local and national news, including: WAGA-TV, channel 5; WATL, channel 36; WGNX, channel 46; WSB, channel 2; WTBS, channel 17; WCEU-TV, channel 69; and, WXIA-TV, channel 11.
- 15. The Station broadcast no editorials. We broadcast no programming that was noted on the logs as "political." Similarly, during the License Term no candidates inquired concerning broadcasting on the Station and the Station broadcast no political

spots.

- 16. WHSG-TV broadcast a great deal of age specific children's programming during the License Term which aimed at satisfying the educational and informational needs of children from pre-schoolers to teenagers. All such programming was received from the network. While I have no children of my own, I am now the paid Children's Minister of my church, and I have been involved in children's ministries at the church I have attended for about 15 years in High Point, North Carolina and then, again, at the church I attended in Atlanta. I have attended seminars and workshops on both the secular and religious educational needs of children, and I have given some seminars and workshops on teaching children in the church. Accordingly, I have some familiarity with children's educational and informational needs. WHSG-TV's children's programs will be described below.
- 17. Joy Junction was a non-TBN produced children's program that was broadcast between 10 and 10:30 a.m. on Saturday mornings during the License Term. This show featured a western theme with the host being a Sheriff, and a studio audience of children seemingly between six and twelve years old. The show would feature skits, the Sheriff interacting with the children in the studio audience, music, competitions between the boys and the girls using scripture, and a regular guest who did drawing and artwork with the children. The Sheriff had a theme or moral lesson that ran through each program, usually based on a scripture verse. These morals might be to work out problems by cooperating, not

fighting; to respect your parents and elders; to work hard to do well in school; to respect other people's property; and others. The children were taught language art skills, memorization techniques, art, music, and lessons about interpersonal skills and relationships. From the ages of the children in the studio audience, the skits, and simple moral lessons taught I believe that the program was designed to appeal to younger children in the six to twelve year old age group.

- 18. Davey and Goliath was a half-hour program produced by the Lutheran Church that ran between 9:00 to 9:30 a.m. every Saturday morning during the License Term. The show was a claymation show, focusing on the adventures of Davey and his dog, Goliath. Their adventures would always involve a moral lesson about good behavior. The sorts of lessons which the program would impart included: encouraging children to tell the truth; teaching children to deal with their problems nonviolently; exhorting children to be kind to one another, to help their Mom and Dad, and to obey their parents. Children learned about literature, art, were taught listening skills and interpersonal relations and social skills. I believe the program was directed at a children's audience in the two through eight year old age group.
- 19. Real Videos is a half-hour TBN produced program that was broadcast throughout the License Term between 1:00 p.m. and 1:30 p.m. on Saturday afternoons, or 1:00 a.m. to 1:30 a.m. on Sunday mornings. Real Videos was a music video show. The show featured wholesome music videos and travel to different program venues, such

as the Long Beach Grand Prix, Knott's Berry Farm, or a Rodeo. The host would encourage his audience to be themselves and resist peer pressure when they knew that they were being pressured into doing something wrong. Children were exhorted to always do their best, particularly in school. Lessons in physical and cultural geography and the language of the place where the program was being filmed were a staple of each show. Real Videos was designed to appeal to pre-teens and teenagers.

The Gospel Bill Show was a half-hour program produced by the Willie George Ministries broadcast throughout the License Term on Saturdays between 9:30 and 10:00 a.m. The show had a western theme with the sheriff interacting with different townsfolk such as the deputy, a storekeeper, a bad guy, etc. Ken Blount, a country and western singer, was the deputy, and was featured in music video segments in the show. One regular character, "Miss Lana," was a positive role model and was always encouraging the children. Each show the Sheriff and the other characters imparted a moral lesson based on Bible scripture, such as telling the truth, or how to be a friend, or the importance of obeying your parents, as the main The show also featured a filmed segment during the show called "At the Zoo," where the host talked about an animal that the children would find at the zoo. This segment was like a little science program. Children learned about science (zoology) and practiced listening skills. From the age of the children who were guests on the show and the level of sophistication of the lessons taught on the program I believe the program was designed for 6 to 12 year olds.

- 21. John Jacobs and the Power Team is a half-hour TBN produced program featuring strong man John Jacobs and his friends doing exhibitions of strength, such as breaking handcuffs. Interspersed with their feats of strength the Power Team would talk about teen-oriented issues such as: peer pressure; the dangers of drugs and alcohol; premarital sex; teen suicides; how to succeed in school; and how to cope with the parent-teen relationship. These homilies also discussed moral lessons. The show appealed to teens and pre-teens. The program was broadcast on between 1:00 p.m to 1:30 p.m. or 1:30 p.m. to 2:00 p.m. on Saturday afternoons throughout the License Term.
- 22. Circle Square is a half-hour non TBN produced program broadcast on Saturday morning at 10:30 a.m. during the License Term. This program was hosted by teenagers featuring music, skits and travel segments. The children on the show would participate in skits modelled on real life situations, stressing the appropriate way to deal with real life situations. Issues such as the importance of living together peacefully, respecting one another's different language and customs, and resisting the temptation to steal were stressed. An important part of the program was the feature where the hosts took a camera to different locations, and where the differences in culture and language would be discussed. The program would, at various times, cover topics relating to physical and cultural geography, literature, drama, and taught interpersonal skills and coping mechanisms. This show was directed

to appeal to the 10 to 16 year old age group.

- 23. Meadowlark Lemon is a TBN produced half-hour program broadcast at 7:00 a.m. on Friday mornings and 4:00 a.m. on Saturday mornings throughout the License Term. The show featured Harlem Globetrotter great Meadowlark Lemon interviewing different professional athletes such as Rosey Grier and Tom Landry, or other celebrities. The interviews would stress how the interviewees dealt with the temptations of drug and alcohol abuse in professional sports, on how to deal with problems in their lives, etc. The show was designed to appeal to a youthful audience of teenagers (12 to 18 year olds).
- 24. <u>Dallas Holm</u> was a TBN produced half-hour program broadcast at various times on Saturday mornings, usually in the early hours (4:00 to 4:30 a.m.) throughout the License Term. The program featured contemporary Christian videos and was designed to appeal to teenagers (12 to 18 year olds).
- 25. <u>Superbook</u> is a half-hour program produced by the Christian Broadcasting Network which was broadcast on Saturday mornings at 8:30 a.m. or Saturday afternoons at 12:30 p.m. during the License Term. The show was (and is) an animated variety program which featured Bible stories, emphasizing the moral lesson of the Bible story. The lessons that would be emphasized would be, for example, on the proper way to interact with others, centering on a theme such as "being kind to one another." The program was aimed at the 4 to 8 year old audience.
 - 26. Flying House was also a half-hour animated program

produced by the Christian Broadcasting Network which was broadcast on Saturday afternoon (12:00 p.m. to 12:30 p.m.) during the License Term. Flying House was an animated feature where a professor could take his house back in time to old testament or new testament times. The children accompanying the professor would become eyewitnesses to events depicted in the scripture, and learn about biblical geography and culture. The program taught about subjects such as the Ten Commandments, and emphasized the moral lesson behind the story, such as how to love one another and be kind to one another. Each program would include lessons in cultural and physical geography, and literature. The program seemed designed to appeal to four to eight year olds.

27. Quigley's Village was a half-hour program broadcast at 11:30 a.m on Saturday mornings during the License Term. Quigley is a Robot who interacts with a village of puppet people. The show featured music and songs, and taught the children moral lessons such as learning to share, to cooperate with one another, to control yourself, to respect their parents, and to always tell the truth. Shows included lessons in language arts (stories) and taught children listening skills. The show seemed directed to appeal to children in the four to ten year old age group. The children were taught songs and about music, Quigley's Village was not produced by TBN, and often contained commercial spots, which TBN children's programming did not. During the License Term the TBN Program Department "sanitized" the program by covering over the commercial spots with public service announcements or program promotions.

Accordingly, no commercial spots were broadcast by the Station.

- 28. The Filling Station was a half-hour non-TBN produced program which was broadcast between 11:00 and 11:30 a.m. on Saturday mornings throughout the License Term. The program was an animated variety show for younger children, in the two to eight year old age group. The show included "Busy Bees" who would teach children simple lessons in appropriate behavior, such as obeying your parents and trying to help Mom and Dad around the house.
- 29. Why Wait was a program hosted by Josh McDowell designed to appeal primarily to teenagers. The program included teen guests and featured discussions of teen issues such as: peer pressure; premarital sex; teen suicide; AIDS; drug and alcohol abuse; and, tips on how to get along with your parents. On occasion the show would have guests, sometimes from the sports or music fields who were familiar to teens, or who were people who were experts in dealing with teen issues. Teen guests would ask questions and discuss teen problems and issues from the perspective of their own experience.
- 30. WHSG-TV broadcast Trinity network programming which was responsive to the problems, needs and issues of WHGS-TV's service area as reported on the Station's Quarterly Reports. One Trinity program, Joy, was a one half-hour program broadcast daily, Monday through Friday, at 9:30 a.m., throughout the entire License Term. Joy was hosted by Jim McClellan discussing community problems and needs with one, sometimes two guests per program. The focus of each program was a community problem or issue. Moreover, even

though the program was produced in Southern California during the License Term, the host made a point of discussing the issue with his guest from both a national and local perspective. For example, discussions of alcohol and drug addiction would include information on where you might go to find help in your own community, or where you might go to find out where help was available in the community. Moreover, since <u>Joy</u> was a network show during the License Term, the producers of the show had the benefit of reviewing our lists of problems and issues in WHSG-TV's service area in choosing the topics to discuss and treat. The problems of health, alcohol and drug addiction, education, homelessness, crime, and transportation—all identified as problems and issues of concern to Station service area residents, were all explored and aired on a regular basis on <u>Joy</u>, as shown in our Quarterly Reports.

- 31. <u>Feedback</u> was a network program broadcast throughout the License Term at different times. From the beginning of the License Term until March 20, 1991 it was broadcast weekly on Wednesdays at 5:00 a.m. It was broadcast again on Wednesday at 5:00 a.m. and again on June 7, 1991 at 12:00 p.m. Finally, from July 7, 1991 through the end of the License Term, <u>Feedback</u> was broadcast at 11:30 a.m. on Thursday each week and rebroadcast on Wednesdays at 5:00 a.m. and Saturdays at 8:30 a.m.
- 32. <u>Feedback</u> was (and is) a half-hour panel show with a host moderating a discussion of an important issue. An African-American attorney, Harold Ray, hosted the program throughout the License Term, and the discussions covered virtually every one of the

problems identified in the WHSG-TV service area as important to members of the community, including: education and schools; crime; drug and alcohol addiction; health, including alternatives to the present health care system; and, homelessness.

- 33. The network <u>Praise the Lord</u> show also treated local needs through its discussions with guests of the issues of importance to the residents of the Station's service area. At least twice during the License Term the program featured as a guest someone from the Atlanta area, Bishop Earl Paulk and singer/musician Dottie Rambo. <u>PTL</u> regularly featured discussions of the problems of crime; drug and alcohol abuse; and, education and schools. <u>Praise the Lord</u> was broadcast nightly (Monday through Friday) at 10:00 p.m. and rebroadcast the next day, throughout the License Term.
- Whitaker talks about health problems such as the effect of a person's lifestyle and their mental outlook on health and the medical ramifications of alcohol and drug abuse. Dr. Whitaker discussed health issues such as "yo-yo" dieting, the weight gain many women experience after a hysterectomy, and good nutrition and dieting. During the License Term the program often treated problems such as health and health care, pollution and the environment, and drug and alcohol abuse. Calling Dr. Whitaker was broadcast once weekly at either 11:30 a.m. or 2:00 p.m., and rebroadcast once more each week.
- 35. A Call to Action is a show about contemporary legal issues hosted by attorney Jay Sekulow which discussed during the

License Term legal problems and issues of concern to members of the Station's service area including education and schools and health care. Other issues covered included prayer in schools, and sex education in schools. Sex education was a subject of some controversy in the Atlanta area during the License Term, and this controversy was mentioned during at least one of Mr. Sekulow's shows. The program was a weekly program shown at 8:30 p.m. and rebroadcast once a week at a different time. Treasures Out of <u>Darkness</u>, was hosted by Sonny and Julie Arquinzoni. I didn't watch the show, but the Quarterly Reports show that the program included discussions of such important issues such as alcohol and drug dependency and crime. The 700 Club, produced by the Christian Broadcasting Network, often included discussion segments treating issues such as: crime; drug and alcohol dependency; health care; education and schools, and others. In The Doctor and the Word, Dr. Reginald Cherry often provided helpful and current information concerning health issues, such as: aging; nutrition; pollution's effect on the body, and was responsive to issues such as the environment, health and pollution. Doctor and the Word was broadcast once a week at either 12:00 p.m. or 2:30 p.m. during the A Date With Dale was (and is) a program hosted by License Term. Dale Evans featuring interview segments with celebrities and others discussing issues such as drug and alcohol dependency.

36. During the License Term WHSG-TV broadcast a number of programs which were produced in the Station's service area. For example, throughout the License Term The Earl Paulk Show was

broadcast at 9:00 a.m. each Sunday morning. Rev. Paulk is the pastor of a large (over 5,000 members) mixed race church in Atlanta. During his sermons and throughout the service Rev. Paulk mentioned the church's outreach ministries in Atlanta, particularly focussing on the children and teenagers in the Bankhead project of Atlanta and the church built low-income housing across the street from the church. The church's food ministry was publicized both to invite people who needed help and to encourage the more fortunate to contribute food and other items to the ministry. The church's large drug and alcohol addiction ministry was often featured, highlighting members of the congregation who gave testimony concerning how they had been helped to conquer their addiction. Rev. Paulk also spoke a great deal about race relations in the community, about the ravages of drug and alcohol dependency, and about AIDS, the homeless, low income housing and poverty. Often the program included interviews with people who were involved in an outreach ministry, and a number would be flashed on the screen during the program so that viewers could call for help from any of the church's many ministries.

- 37. Similarly, beginning November 23, 1991 and throughout the License Term the Rev. Charles Stanley broadcast his church service from his large Atlanta church at 8:00 p.m. every Saturday night. The program's name is <u>In Touch</u>. Reverend Stanley would often address local issues during his preaching, including, during the License Term, the issue of AIDS.
 - 38. Both <u>In Touch</u> and Bishop Paulk's show were broadcast

nationwide on the network. From October 6, 1991 through the end of the License Term, however, one program, Changing Your World, produced by the World Changer's Ministry in Atlanta, was seen only within the WHSG-TV service area. The program was broadcast each Sunday morning at 10:30 a.m. Although the program was primarily a religious program produced by a large and dynamic African-American congregation, the pastor, Rev. Creflow Dollar, often dealt with local issues such as racism, poverty and fair housing in his sermons.

39. Finally, WHSG-TV broadcast a number of PSAs during its programming during the License Term, on the average of between 25 and 30 a week. These PSAs are network PSAs inserted in network programming. A review of the Station's Quarterly Reports shows how the PSAs broadcast during network programming are often specifically responsive to the problems and needs ascertained in the Monroe service area.

SUPPORTING DECLARATION

I, Scott W. Jackson, hereby swear under penalty of perjury of the laws of the United States and the State of Georgia, that the foregoing "Testimony of Scott W. Jackson," consisting of 21 pages, was prepared by me for submission to the Federal Communications Commission in connection with MM Docket No. 93-156, and that my testimony is true and accurate to the best of my knowledge and belief.

Executed this 2/ day of april, 1994.

Scott W. Jackson